

EXHIBIT B

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NEVADA EQUAL RIGHTS
COMMISSION



DETR

Nevada Department of Employment,
Training and Rehabilitation

BRIAN SANDOVAL
Governor

DON SODERBERG
Director

KARA M. JENKINS
Administrator

January 16, 2018

Sandra Ketner Esq. - Counsel
Littler Mendelson, P.C.
200 S. Virginia St., 8th Floor
Reno, NV 89501

Date of Most Recent Alleged Violation: 10/15/2017
Place of Alleged Violation: Reno, NV
NERC Charge Number: 0112-18-0007R
EEOC Charge Number: 34B-2017-01343

NOTICE OF CHARGE OF DISCRIMINATION

RETAIN THIS COPY FOR YOUR FILES
DO NOT RETURN IT TO THIS OFFICE

You are hereby notified that a charge of employment discrimination has been filed against your organization under:

- ☒ Title VII of the Civil Rights Act of 1964
- ☒ The Age Discrimination in Employment Act of 1967
- ☒ The Americans with Disabilities Act
- ☒ Nevada Revised Statutes

Please return the enclosed Election of Response form **on or before Wednesday, January 31, 2018**, to the below listed address (facsimile accepted), indicating whether you choose to seek early resolution, to participate in or waive participation in the Informal Settlement Conference. **If you fail to respond by this date, we will forward the case to investigation. All extensions must be approved by the mediator or his designee.** Should you elect **not** to seek an early resolution, submit a written position statement fully addressing the allegation(s) of the charge, accompanied by supporting documentation and/or written statements to NERC **on or before Wednesday, March 28, 2018**.

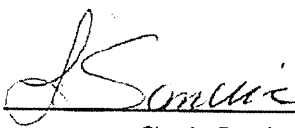
Please be advised that pursuant to state and federal laws, an employer is required to preserve all personnel and other records that may be relevant to the charge until final disposition of the charge.

Should you have any questions, please contact the Nevada Equal Rights Commission at the below listed number and reference the charge number shown above.

Enclosure: Copy of Charge
Remedy Request
Form 131 w/ Attachment
Election of Response Form
NERC Procedures



EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <input checked="" type="checkbox"/> FEPA 0112-18-0007R <input checked="" type="checkbox"/> EEOC 34B-2017-01343	
Nevada Equal Rights Commission and EEOC <small>State or local Agency, if any</small>			
Name (Indicate Mr., Ms., Mrs.) Mrs. Lucero Sanchez		Home Phone (Incl. Area Code) (775) 342-7554	
Street Address 1730 Dark Horse Rd. Apt. A, Reno, NV 89521		Date of Birth 1973	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name RENOWN HEALTH		No. Employees, Members 500 or More	
Street Address 10101 Double R. Blvd., Reno, NV 89521		Phone No. (Include Area Code) (775) 982-7210	
Name 		No. Employees, Members 	
Street Address 		Phone No. (Include Area Code) 	
Name 		No. Employees, Members 	
Street Address 		Phone No. (Include Area Code) 	
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest Latest 07/15/2015 10/15/2017 <input checked="" type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>The Respondent discriminates against me on the basis of disability, national origin (Hispanic) and/or age (44) and/or retaliation. I am subjected to different terms and conditions of employment, denied a reasonable accommodation, I was demoted and denied compensation. I filed my complaint with the Nevada Equal Rights Commission on August 30, 2017.</p> <p>I was hired by the Respondent on August 23, 1993 and I am currently employed as a Cashier.</p> <p>Starting on or about the summer of 2015, Christina Vargas (non-Hispanic) and Justin Bart (non-Hispanic) became my direct supervisors and began to subject me to unfair treatment. They would interfere with my duties, make rude comments and ignore me. Ms. Vargas had previously stated that she "hated Mexicans." Ms. Vargas and Mr. Bart also took my office away and awarded it to a younger individual.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DAY (month, day, year)	
Date 8/8/18		Charging Party Signature 	

RENOWN001039

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented To: Agency(ies) Charge No(s):

☒ FEPA

0112-18-0007R

☒ EEOC**34B-2017-01343****Nevada Equal Rights Commission**

and EEOC

State or local Agency, if any

In the summer of 2016 I suffered a workplace injury which resulted in my care provider requesting that I be placed on light duty and I was not to lift more than ten pounds. However, the Respondent continuously required that I work outside my restrictions from the summer of 2016 to the fall of 2017.

On or around December 29, 2016 I was demoted to the position of Cashier and I took a significant pay cut. I was never provided a reason for my demotion. As of December 2017, the Respondent has begun paying me at the rate I was paid prior to the demotion. However, they have not retroactively paid me back for the entire period for which I was being paid less. During the past two years of my employment I took my concerns to Suzanne Oetjen, Human Resources several times but she would not listen to me. I believe I was demoted in retaliation for requesting light duty and/or on the basis of my national origin and/or on the basis of my age.

I believe the Respondent's actions violate Title VII of the Civil Rights Act of 1964, as amended, the Age Discrimination in Employment Act (ADEA), the Americans with Disabilities Act Amendments Act (ADAAA) and Nevada State Law.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

1/8/18

Date



Charging Party Signature

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

RECEIVED

SUBSCRIBED AND SWORN TO BEFORE ME THIS **JAN 08 2018**
(month, day, year)

NERC Reno

RENOWN001040